

### **III. REMARKS**

Claims 1-16 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1 and 12-15 are rejected under 35 U.S.C. §103(a) as allegedly being anticipated by Gray (U.S. Patent No. 5,844,497), hereafter “Gray,” in view of Laage *et al.* (U.S. Patent No. 6,931,382), hereafter “Laage.” Claims 2 and 6 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gray in view of Laage and further in view of Boyko *et al.* (U.S. Patent No. 7,047,408), hereafter “Boyko.” Claim 3 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gray in view of Laage and further in view of Patzer (U.S. Patent No. 6,732,270), hereafter “Patzer.” Claims 6-8 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gray in view of Laage and further in view of Davis *et al.* (U.S. Patent No. 6,064,736), hereafter “Davis.” Claim 4, 5 and 10 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gray in view of Laage and further in view of Yatsukawa (U.S. Patent No. 6,148,404), hereafter “Yatsukawa.” Claim 11 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Gray in view of Laage and Yatsukawa, and further in view of Davis.

**A. REJECTION OF CLAIMS 1, 9 AND 12-15 UNDER 35 U.S.C. §103(a) OVER GRAY IN VIEW OF LAAGE**

With regard to the 35 U.S.C. §103(a) rejection over Gray in view of Laage, Applicants assert that the references cited by the Office do not teach or suggest each and every feature of the claimed invention. For example, with respect to independent claims 1 and 12-15, Applicants submit that the cited references fail to teach or suggest that the authentication check is adapted to be performed without having the client password in a cleartext format on the server data processing system. The Office admits that Gray does not specifically teach this feature of the claimed invention. Instead, the Office relies on a passage of Laage teaches that “Only the ‘hash’ of the original password is stored in the database.” However, elsewhere Laage recites “[u]pon entering a username and password, the entered information is transmitted to the central server 15, together with the corresponding encrypted information on the CD-ROM 3.” Col. 10, lines 44-46. To this extent, in contrast to information on the CD-ROM of Laage, which is encrypted, the password is forwarded to the central server as entered, i.e., in plain text form. This is further borne out elsewhere in Laage, which states “...a hash algorithm then (i.e., after it has been sent in plain text form to the central server) creates a hash of the password submitted by the user and the server compares the hash from the user and the hash from the database.” Col. 10, lines 53-56, parenthetical added. To this extent, the server in Laage receives the password in clear text form and then hashes it at the server.

In contrast, the claimed invention includes “...performing an authentication check using the client data processing system’s cipher-protected client password and the server data processing system’s stored cipher-protected client password as a shared secret for said authentication check, wherein the authentication check is adapted to be performed without

having the client password in a cleartext format on the server data processing system.” Claim 1. As such, unlike Laage, in which the password is received in cleartext format, the client password of the claimed invention is stored on the server data processing system in a cipher-protected format and is used for an authentication check against the cipher-protected client password from the client data processing system without being in a cleartext format on the server data processing system. Thus, the hashing of Laage at the server does not teach or suggest the performing of an authentication check without having the client password on the server data processing system in a cleartext format. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to the Office’s other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

## **B. OTHER REJECTIONS OF CLAIMS UNDER 35 U.S.C. §103(a)**

With regard to the other 35 U.S.C. §103(a) rejections, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 16, as argued above with respect to independent claims 1 and 12-15, the cited references fail to teach or suggest performing an authentication check using the client data processing system’s cipher-protected client password and the server data processing system’s stored cipher-protected client password as a shared secret for said

authentication check, wherein the authentication check is adapted to be performed without having the client password in a cleartext format on the server data processing system. Boyko does not cure this deficiency. Accordingly, Applicants respectfully request withdrawal of this rejection.

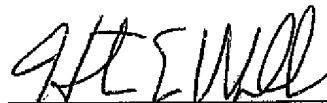
With regard to the Office's arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submits that all defendant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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